

REMARKS

Entry of the foregoing and reconsideration of the application identified in caption, as amended, pursuant to and consistent with 37 C.F.R. §1.114 and in light of the remarks which follow, are respectfully requested.

By the above amendment, claim 1 has been amended to recite that the bleach composition is introduced to the color photographic material at least about 24 hours after the steps a) and b) are conducted. Support for this amendment can be found in the specification at least at page 10, lines 16-20, taken in connection with page 8, lines 17-19. In this regard, the specification discusses that an advantage of an exemplary bleach composition is that it is not required that the composition be used immediately or soon after formation thereof. That is, the bleach composition can be used a period of time after it is formed. See also the examples set forth at pages 12-15 of the specification. The specification further states that an exemplary bleach composition can avoid the formation of an iron-containing precipitate for relatively long periods of time, e.g., at least about 24 hours. As such, it is apparent that the specification contains support for the above amendment of claim 1. Entry of the above amendment is proper at least because a Request for Continued Examination is being filed herewith. See 37 C.F.R. §1.114.

In the Official Action, claims 1-12 and 22-24 stand rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 6,534,253 (*Kuykendall et al*). Withdrawal of this rejection is respectfully requested for at least the following reasons.

According to one aspect as defined by claim 1, a method of manufacturing a bleach composition comprising a ferric 1,3-propylene diamine tetraacetic acid complex is provided. The method comprises: a) reacting ferrous bromide with unchelated 1,3-PDTA, thereby forming a ferrous 1,3-PDTA complex; and b) conducting an oxidation process wherein an amount of the ferrous 1,3-PDTA complex is converted to the ferric 1,3-PDTA complex. The

steps a) and b) are conducted before introducing the bleach composition to a color photographic material. The bleach composition is introduced to the color photographic material at least about 24 hours after the steps a) and b) are conducted.

As discussed in the instant specification at page 10, an exemplary bleach composition does not have to be used immediately or soon after formation thereof due to, for example, the good stability characteristics thereof. Advantageously, this can enable the bleach composition to be introduced to the color photographic material at least about 24 hours after the formation of the bleach composition.

Kuykendall et al does not disclose or suggest each feature of one aspect of the present invention as defined by claim 1. For example, *Kuykendall et al* does not disclose or suggest that a bleach composition is introduced to a color photographic material at least about 24 hours after the steps a) and b) are conducted, as recited in claim 1. That is, *Kuykendall et al* fails to disclose or suggest that the bleach composition is introduced to the color photographic material at least about 24 hours after conducting an oxidation process wherein an amount of the ferrous 1,3-PDTA complex is converted to the ferric 1,3-PDTA complex.

By comparison, *Kuykendall et al* discloses the following at column 9, lines 2-48:

Since the bleach-fixing precursor compositions are provided from an enclosed container that contains limited oxygen, ferrous ion oxidation must occur during or after direct delivery of the composition to the processing chamber.

For example, during direct delivery from the enclosed container (for example, in delivery lines), ferrous ion oxidation can be carried out by bubbling air or oxygen through the bleach-fix precursor solution in the delivery line or in a chamber prior to or during delivery to the processing chamber.

* * *

By "direct" delivery in the practice of this invention, we mean that the bleach-fixing precursor composition is supplied to the processing chamber from the enclosed container without any passage into or through another processing vessel or tank,

or chemical treatment. The delivered composition may be diluted "in-line", or aerated as described above. [Emphases added.]

In view of the above, it is apparent that *Kuykendall et al* discloses that the ferrous ion oxidation must occur during or after direct delivery of the composition to the processing chamber. That is, *Kuykendall et al*'s oxidized composition is formed while being directly delivered to the processing chamber or in the processing chamber itself. Clearly, *Kuykendall et al* has no recognition or suggestion of introducing a bleach composition to the color photographic material at least about 24 hours after the steps a) and b) are conducted, as recited in claim 1. Moreover, absent an improper resort to Applicant's own disclosure, one of ordinary skill in the art would not have been motivated to modify *Kuykendall et al* to arrive at the claimed invention.

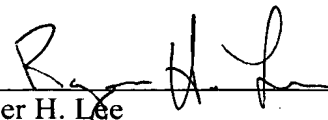
For at least the above reasons, it is apparent that no *prima facie* case of obviousness exists. Accordingly, withdrawal of the above §103(a) rejection is respectfully requested.

From the foregoing, further and favorable action in the form of a Notice of Allowance is believed to be next in order, and such action is earnestly solicited. If there are any questions concerning this paper or the application in general, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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